

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**INGA DOW,**  
**Plaintiff,**

**V.**

**KELLER WILLIAMS REALTY, INC.,  
JOHN DAVIS, GO MANAGEMENT, LLC,  
DAVID OSBORN, SMOKEY GARRETT,  
AND GARY KELLER,**

## Defendants.

**CIVIL ACTION NO. 4:21-cv-01209-P**

**DEFENDANTS KELLER WILLIAMS REALTY, INC. AND GARY KELLER’S  
MOTION TO COMPEL ARBITRATION**

Defendants Keller Williams Realty, Inc. (“KWRI”) and Gary Keller (“Keller”) (collectively “Defendants”) move to compel this entire dispute to arbitration pursuant to the Federal Arbitration Act (“FAA”), 9 U.S.C. §§ 1-16. As grounds for this Motion to Compel Arbitration, Defendants respectfully show the following:

1. This lawsuit arises from Plaintiff Inga Dow’s ownership of three Keller Williams® real estate brokerage franchises (“Market Centers”). Each of Dow’s license agreements with KWRI contain an arbitration clause.
2. Defendants move to compel arbitration of this dispute because it falls within the scope of the arbitration clauses in the License Agreements.
3. Dow’s claims against the remaining defendants (who are not signatories to the license agreements) are intertwined with the allegations against KWRI, and thus, the entire dispute—not just the allegations involving KWRI—is subject to arbitration.

For the reasons set forth above, Defendants KWRI and Keller respectfully request that this motion be granted and that the Court compel arbitration of this dispute.

Respectfully submitted,

By: /s/ Kristin L. Bauer

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**ATTORNEYS FOR DEFENDANTS  
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AND GARY KELLER**

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for defendants Keller Williams Realty, Inc. and Gary Keller conferred with counsel for Plaintiff on February 24, 2022, regarding the substance of this motion and that Plaintiff's counsel is opposed to this motion. Defendants' counsel also conferred with counsel for John Davis on the relief sought in this motion on March 1, 2022, by email and phone, but those conference efforts have not been exhausted; counsel will update the court on Davis's counsel's position once confirmed. Defendants' counsel also conferred with counsel for Go Management, LLC, David Osborn, and Smokey Garrett, by phone on March 1, 2022; these conference efforts have likewise not been exhausted, and counsel will update the court on their position once confirmed.

/s/ Kristin Bauer

Kristin L. Bauer

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure on March 1, 2022.

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